

From: Brandon Green Reg. No. 56400-054
Defendant, Pro Se

cc: AUSA Jessica Feinstein

Re: 16 Cr. 281-002 (PGG)

Date: January 17, 2021

LETTER REGARDING CLIENT FILE

Your Honor:

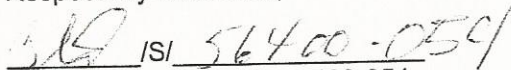
Thank you for your time. I'm writing to inform this Court that since my last appearance in this matter I've received the Attorney-Client Privilege Waiver Form, and what appears to be the Attorney Zoe Dolan's Client File for me. Missing, however, is my Client File from Trial Counsel(s) the Attorneys Eric R. Breslin, and Melissa S. Geller. From what I gather their Client File for me was sent to Ms. Dolan - when she took over my Case - on a Flash Drive that is not working. The USB may have a virus on it, may be corrupt, or just maybe it does not work. I've heard multiple things.

In a letter sent from Ms. Dolan to Mr. Witzel, dated December 14, 2020, Ms. Dolan states: "Please find enclosed my case file in Brandon Green's case... . Also included is a flash drive from predecessor counsel Eric Breslin and Melissa Geller, which I understand was supposed to contain their client file; however, as I mentioned when we spoke on the phone, the device appears to be corrupted or no longer holds any data. You may wish to contact them directly for another copy." Quoting Ms. Dolan's Letter to Mr. Witzel, dated: December 14, 2019. Mr. Witzel also informed me - in his letter sent to me with Ms. Dolan's Client File and the Waiver Form - that: "The only item that we received from Ms. Dolan that is not included in this package is a USB flash drive. As we have discussed, the flash drive contained no readable data." Quoting Mr. Witzel's Letter to me dated: January 8, 2021.

For some reason, as far as I know, no one has tried to contact Mr. Breslin or Ms. Geller to obtain a working client file for me. I intend on doing this myself since I find it unlikely that anyone else here will; however, I feel that the Court's, the Government, and Trial Counsel(s) all have a duty and obligation to make sure that I am provided with this. I need this information. Moreover, until I receive and review Trial Counsel's Client File, I can not adequately prepare my claims regarding, among other things, ineffective assistance of counsel and prosecutorial misconduct.

Therefore, I ask this Court to please take Notice that I'm still without Trial Counsel(s) Client File; and I ask everyone here to assist me in getting this information so that I can adequately respond to this Court's Order(s), and so I can finish preparing my claims regarding the violations of my rights which took place here.

Respectfully Submitted,

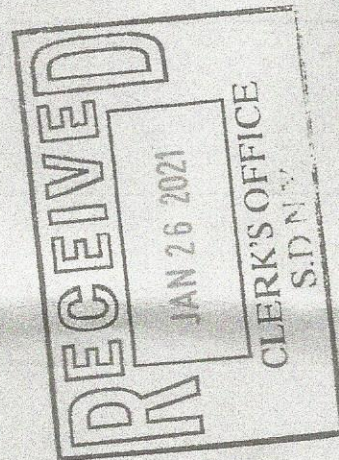
 ISI 56400-054
Brandon Green Reg. # 56400-054
Defendant, Pro Se

1-21-2021

Don Green 36110-037
- Brooklyn
x 329002
lyn, ny 11232

Attn :

U.S. Clerk For S.D.N.Y.
500 Pearl Street
New York, ny ~~10007~~ 10007



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